



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 West 15th Street, Suite 3200
HELENA, MONTANA 59626

Ref: 8MO

October 11, 2007

Ms. Deborah L.R. Austin, Forest Supervisor,
Lolo National Forest
Building 24, Fort Missoula
Missoula, MT 59804-7297

Re: CEQ 20070393; Fishtrap Draft
Supplemental Environmental Impact
Statement

Dear Ms. Austin:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Draft Supplemental Environmental Impact Statement (DSEIS) for the Fishtrap Project.

This DSEIS discloses additional information regarding recent monitoring of effects of past treatments within old growth timber stands, and also indicates that the Montana Dept. of Environmental Quality (MDEQ) has reassessed water quality in Fishtrap Creek and West Fork Fishtrap Creek, and revised the water quality designation of these waterbodies from "impaired" to "fully supporting beneficial uses." The DSEIS does not appear to materially change the earlier action alternatives identified and evaluated in the 2005 Final EIS.

The EPA continues to support Fishtrap Project Alternative 2, since it would reduce sediment delivery to streams and improve channel function and hydrologic processes by the greatest amount over the long-term, and result in greater improvements in terms of reduced road density, increased wildlife connectivity and decreased wildlife fragmentation and disturbance. Although we do recognize that some short-term water quality impacts may occur during implementation of proposed vegetative treatments.

We are pleased that the MDEQ's reassessment of Fishtrap Creek and West Fork Fishtrap Creek indicates that these water bodies are now fully supporting beneficial uses, and that despite this change in designation, watershed restoration and enhancement of water quality, fish habitat and fish passage remain a prominent part of the Fishtrap Project (i.e., road maintenance/BMP improvements are proposed on 50 miles of road, with 151 miles of road closure, storage, and decommissioning and 110 stream crossing removals, and 1 mile of woody debris placements in Fishtrap Creek, replacement of the Stony Lake bridge and application of road BMPs on Road 7593-2 for access to Fishtrap Lake, and improvements to Road 7609 in the West Fork Fishtrap Creek drainage and Road 7675). We appreciate the extent of proposed watershed restoration

actions that benefit water quality and fisheries. We also support the earlier deletion of harvest units 1, 56, 95, and 193 (totaling approximately 87 acres) from the project, including 60 acres of shelterwood harvest in old growth stands.

Also as stated in our previous comments, we appreciate efforts of Plains/Thompson Falls Ranger District staff to work with the U.S. Fish & Wildlife Service, Montana DEQ and EPA to develop an improved timing schedule for road and culvert activities relative to timber harvest to reduce duration and magnitude of short-term sediment effects to fisheries. Fishtrap Creek is identified in the Inland Native Fish Strategy and Montana Bull Trout Restoration Plan as a priority watershed and core area for bull trout protection and restoration, so anticipated reductions in sediment delivery over the long-term and habitat improvements in Fishtrap Creek should assist bull trout recovery.

Thank you for the opportunity to review and comment on the DSEIS. If you have any questions please contact Mr. Steve Potts of my staff in Helena at 406-457-5022 or in Missoula at 406-329-3313 or via e-mail at potts.stephen@epa.gov.

Sincerely,

/s/ John F. Wardell
Director
Montana Office

cc: Larry Svoboda/Julia Johnson, EPA 8EPR-N, Denver
Pat Partyka, Plains/Thompson Falls Ranger District, Plains



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